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April 10, 2019

VIA ECF

Hon. Joseph A. Dickson
United States Magistrate Judge
Martin Luther King Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: In re Mercedes-Benz Emissions Litigation
Civil Action No. 16-881 (JLL)(JAD)

Dear Judge Dickson:

This firm, along with Hagens Berman Sobol Shapiro LLP, is interim class counsel and we, along with Seeger Weiss LLP, represent Plaintiffs in the above-referenced matter. We write on behalf of all parties and intervening parties to respectfully request an extension until April 24, 2019, to file a Motion to Seal confidential information in letters regarding the potential appointment of a Special Master in this case, and in the transcript of the hearing held before Your Honor on March 18, 2019.

All interested parties are in the process of meeting and conferring in an attempt to reach agreement on each proposed redaction. The parties have reached agreement on the overwhelming majority of proposed redactions and respectfully request an extension to continue working on the remaining issues that they have not resolved. Until the Court rules on the forthcoming motion to seal, we respectfully request that Dkt. No. 165, 167, 170, 180-82, and the hearing transcript (Dkt. No. 188) be kept under seal. If the parties' requested extension is acceptable to the Court, kindly "So Order" this letter and return a filed copy to all counsel via the Court's CM/ECF system.

Thank you for your continued attention to this matter. Of course, if Your Honor or Your Honor's Chambers have any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Donald A. Ecklund

DONALD A. ECKLUND

cc: All Counsel (via ECF)